

**IN THE COURT OF COMMON PLEAS  
OF ALLEGHENY COUNTY, PENNSYLVANIA**

RUSSELL EBLE and CHRISTINE EBLE,  
Husband and Wife,

Plaintiffs,

v.

KHARAK SINGH and YG LOGISTICS  
CANADA, LTD.,

Defendants.

**Certificate of Compliance**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents different than non-confidential information and documents.



Matthew Marquette

CIVIL DIVISION

GD No.

**COMPLAINT**

Filed on Behalf of Plaintiff:

*Russell and Christine Eble*

Counsel of Record for This Party:

Trent Echard, Esquire

Pa. I.D. No. 206598

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Matthew Marquette, Esquire

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ECHARD MARQUETTE, P.C.

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**IN THE COURT OF COMMON PLEAS  
OF WESTMORLAND COUNTY, PENNSYLVANIA**

RUSSELL EBLE and CHRISTINE EBLE,  
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Plaintiffs,

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CIVIL DIVISION

GD No.

**NOTICE TO DEFEND**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Verified Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Verified Complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**LAWYER REFERRAL SERVICE  
ALLEGHENY COUNTY BAR ASSOCIATION**

400 Koppers Building 435 Seventh Ave.

PITTSBURGH, PA 15219

(412) 261-5555

<https://www.getapittsburghlawyer.com/>

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RUSSELL EBLE and CHRISTINE EBLE,  
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KHARAK SINGH and YG LOGISTICS  
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Defendants.

CIVIL DIVISION

GD No. :

**COMPLAINT**

Plaintiffs Russell Eble and Christine Eble, husband and wife, by and through their attorneys, Matthew S. Marquette and Echard Marquette, P.C., files the within Complaint against the Defendants Kharak Singh and YG Logistics Canada, LTD., and avers as follows:

1. The Plaintiffs in this action are Russell Eble and Christine Eble, married adult individuals, that reside at 15 Elton Avenue, Pittsburgh, PA 15227.
2. Defendant Kharak Singh, is an adult individual who resides at 14 Pink Street, Brampton, Ontario, Canada, L6P 3M8.
3. Defendant YG Logistics Canada, LTD., is business formed under the laws of Ontario, Canada with a principal place of business at 14 Pink Street, Brampton, Ontario, Canada, L6P 3M8.

**JURISDICTION AND VENUE**

4. This action arises under the laws of the Commonwealth of Pennsylvania and is within the subject matter jurisdiction of this Honorable Court

5. This action arises out of a motor vehicle accident that occurred in Allegheny County, Pennsylvania.

6. Venue for the subject action is proper in this Honorable Court.

### **FACTS**

7. On February 14, 2020 around 4:05 P.M., Defendant Singh while driving a commercial truck owned and operated by Defendant YG Logistics Canada, LTD was driving north on state route 51 making a right-hand turn to go inbound into the Liberty Tunnels.

8. At the same time and place the Plaintiffs were in the other dedicated right hand turn lane negotiating the same right-hand turn into the Liberty Tunnels.

9. During the turn, Defendant Singh caused his vehicle to go into the lane the Plaintiffs' vehicle was traveling in, causing a collision between the two vehicles.

10. The collision pinned the Plaintiffs' vehicle to the curb.

11. The collision between the Defendants' truck and Plaintiffs' car caused a violent impact on the car and its occupants.

12. Plaintiffs suffered serious injuries in the accident for which they both sought medical attention.

13. Husband-Plaintiff was diagnosed with a torn right rotator-cuff and separate soft tissue injuries in his neck and back area.

14. Wife-Plaintiff was diagnosed with soft tissue injuries to her neck and back area and was diagnosed with a right knee injury.

15. To treat the injuries, they sustained the Plaintiffs each sought treatment with therapists and specialists.

16. As of the filing of this Complaint, the Plaintiffs are still receiving medical treatment to treat the injuries they sustained from the collision with the Defendants on February 14, 2020.

**COUNT I**  
**NEGLIGENCE**

**Russell And Christine Eble V. Kharak Singh**

17. The foregoing paragraphs are incorporated as if set forth at length herein.

18. At the time the incident occurred, the Defendants owned and/or operated, and/or were in control of the vehicle that unlawfully collided with Plaintiffs' vehicle.

19. At the time of the incident, the Defendant-Singh failed to exercise reasonable care in the operation of his vehicle in respect to the following:

- (a) Defendant-Singh unlawfully crossed into the Plaintiffs' lane of traffic;
- (b) Defendant-Singh recklessly operated his vehicle by entering the Plaintiffs' Lane of traffic;
- (c) Defendant-Singh recklessly, carelessly and negligently operated his vehicle, by failing to stay in his lane of traffic.
- (d) In otherwise failing to heed road the pavement markings signaling a dotted white line and causing a collision; and
- (e) In operation his vehicle in violation of 75 Pa.C.S.A. Vehicles § 3301, requiring drivers to drive on the right half of the roadway.

20. As a direct, proximate, and foreseeable result of the Defendant-Singh's negligence and failure to exercise due care in the operation of his vehicle, Plaintiff-husband has suffered substantial personal injury, including:

- (a) Right shoulder rotator cuff tear;

- (b) Right shoulder adhesive capsulitis;
- (c) Decreased range of motion in right shoulder;
- (d) Decreased mobility of right arm;
- (e) Right shoulder pain and soreness;
- (f) Soft tissue injuries to his neck;
- (g) Soft tissue injuries to his back and
- (h) Soft tissue injuries to his head.

21. As a direct, proximate, and foreseeable result of the Defendant-Singh's negligence and failure to exercise due care in the operation of his vehicle, Plaintiff-wife has suffered substantial personal injury, including:

- (a) A right knee injury;
- (b) Soft tissue injuries to her neck; and
- (c) Soft tissue injuries to her head, and
- (d) Soft tissue injuries to her back.

22. The Plaintiffs have intermittently been unable to work due to the injuries they each sustained.

23. Additionally, the injuries the Plaintiffs have suffered have substantially interfered with their daily routine/activities and their general enjoyment of life.

WHEREFORE, Plaintiffs respectfully request judgment in their favor and against Defendants including an award of damages in excess of \$50,000, interest and costs, and such other relief as the Court deems appropriate.

**COUNT II**  
**VICARIOUS LIABILITY**

**Russell and Christine Eble v. YG Logistics Canada, LTD.**

24. All the foregoing averments of this Complaint are incorporated as if fully set forth herein.

25. At all times material and relevant hereto, YG Logistics Canada, LTD acted by and through its agents, owners, ostensible agents, servants and/or employees.

26. At all times material and relevant hereto, Defendant Singh was an agent, ostensible agent, owner, servant, and/or employee of YG Logistics Canada, LTD.

27. YG Logistics Canada, LTD, as well as its agents, ostensible agents, owners, servants, and/or employees, had a duty to act prudently, and had a duty to prevent harm to other drivers on the road, including Plaintiffs.

28. The negligent actions committed by Mr. Singh set forth above occurred during and within the scope of his employment and or ownership of, YG Logistics Canada, LTD.

29. YG Logistics Canada, LTD., as well as their agents, ostensible agents, servants, and/or employees, negligently breached its duties owed to the Plaintiffs in that YG Logistics Canada, LTD. is liable for each and every element of Mr. Singh's negligence, as the same is set forth more specifically in the preceding paragraphs of this Complaint.

30. As a direct and proximate result of the conduct and actions of Mr. Singh, the Plaintiffs have suffered those elements of damage as described herein.

31. Under Pennsylvania law, YG Logistics Canada, LTD., as Mr. Singh's employer or business is vicariously liable for Mr. Singh's reckless conduct.

WHEREFORE, Plaintiffs Russell and Christine Eble respectfully requests judgment in their favor and against the Defendant YG Logistics Canada, LTD., that includes an award of damages in excess of \$50,000, interest and costs, and such other relief as the Court deems to be just and proper.

**COUNT III**  
**LOSS OF CONSORTIUM**

**Russell Eble v. All Defendants**

32. All the foregoing averments of this Complaint are incorporated as if fully set forth herein.

33. As a direct and proximate result of the injuries sustained by his wife, Plaintiff-Husband has been damaged as follows:

- (a) Plaintiff-Husband has been and will continue to be compelled to expend sums of money for medical care, physical therapy, supplies, appliances and medicine;
- (b) Plaintiff-Husband has been and/or may be compelled to expend large sums of money for hiring help to perform household duties previously performed by his wife.
- (c) Plaintiff-Husband has been and will be deprived of his wife's aid, comfort, assistance, companionship and consortium.

WHEREFORE, Plaintiff-Husband, respectfully requests judgment in her favor and against all the Defendants, that includes an award of damages in excess of \$50,000 and such other relief as the Court deems appropriate.



**COUNT IV**  
**LOSS OF CONSORTIUM**

**Christine Eble v. All Defendants**

34. All the foregoing averments of this Complaint are incorporated as if fully set forth herein.

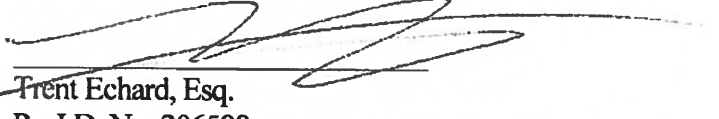
35. As a direct and proximate result of the injuries sustained by his wife, Plaintiff-Wife has been damaged as follows:

- (a) Plaintiff-Wife has been and will continue to be compelled to expend sums of money for medical care, physical therapy, supplies, appliances and medicine;
- (b) Plaintiff-Wife has been and/or may be compelled to expend large sums of money for hiring help to perform household duties previously performed by her husband.
- (c) Plaintiff-Wife has been and will be deprived of his husband's aid, comfort, assistance, companionship and consortium.

WHEREFORE, Plaintiff-Wife, respectfully requests judgment in her favor and against all the Defendants, that includes an award of damages in excess of \$50,000 and such other relief as the Court deems appropriate.

Respectfully submitted,

ECHARD MARQUETTE, P.C.

A handwritten signature in black ink, appearing to read 'Trent Echard', is written over a horizontal line.

Trent Echard, Esq.

Pa. I.D. No. 206598

[trent@trustemlaw.com](mailto:trent@trustemlaw.com)

Matthew Marquette, Esq.

Pa. I.D. No. 87640

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4773 William Flynn Highway

Allison Park, PA 15101


(412) 998-7000

(412) 274-0102 (fax)

**VERIFICATION**

I, Russell F. Eble, hereby verify that statements set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

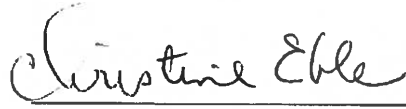
Dated: 2/9/22

  
\_\_\_\_\_  
Russell F. Eble

**VERIFICATION**

I, Christine Eble, hereby verify that statements set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Dated: 2/9/22

  
Christine Eble

**Allegheny County Department Of Court Records**Civil/Family Division Docket Report

Run Date and Time: 4/27/2022 - 14:17:28

GD-22-001568

Eble etal vs Singh etal

Filing Date:

2/9/2022

Related Cases:

Consolidated Cases:

Judge:

No Judge

Amount In Dispute:

\$ 0

Case Type:

Motor Vehicle Accident

Court Type:

General Docket

Current Status:

Complaint

Jury Requested:

Y

**--Parties--**

LName	FName	MI	Type	Address	Initial Service Completion	Attorney
Eble	Christine		Plaintiff	15 Elton Avenue Pittsburgh PA 15227	--	Matthew S Marquette
Eble	Russell		Plaintiff	15 Elton Avenue Pittsburgh PA 15227	--	Matthew S Marquette
Singh	Kharak		Defendant	14 Pink Street Brampton ON L6P 3M8	--	--
YG Logistics Canada Ltd.			Defendant	14 Pink Street Brampton ON L6P 3M8	--	--

**--Attorney--**

LName	FName	MI	Type	Address	Phone
Marquette	Matthew	S	Plaintiff's Attorney	4773 William Flynn Highway Allison Park PA 15101	4129987000
Mangino	Joni	M	Attorney		--

**--Non Litigants--**

LName	FName	MI	Type	Address	Phone

LName	FName	MI	Type	Address	Phone
No Litigants Found					

## --Docket Entries--

Filing Date	Docket Type	Docket Text	Filing Party
2/9/2022	Complaint		Christine Eble

## --Judgments Against--

Name	Amount	Satisfied(Y,N)
No Judgments Found		

## --Events Schedule--

Event Scheduled	Event Date & Time	Room Number	Judge/Hearing Officer
No Information Found			